

Kent F. Larsen, Esq.
 Nevada Bar No. 3463
 Katie M. Weber, Esq.
 Nevada Bar No. 11736
 SMITH LARSEN & WIXOM
 Hills Center Business Park
 1935 Village Center Circle
 Las Vegas, Nevada 89134
 Tel: (702) 252-5002
 Fax: (702) 252-5006
 Email: kfl@slwlaw.com
 kw@slwlaw.com
 Attorneys for Defendants
 JPMorgan Chase Bank, N.A., individually
 and as an acquirer of certain assets and liabilities of
 Washington Mutual Bank, FA from the FDIC,
 acting as receiver, and California Reconveyance
 Company

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

HANH NGUYEN,)	CASE NO. 2:11-cv-01799-LRH-RJJ
)	
Plaintiff,)	
)	
v.)	
)	
WASHINGTON MUTUAL, BANK N.A.;)	DEFENDANTS' OBJECTION TO
JPMORGAN CHASE BANK, N.A.;)	PLAINTIFF'S REQUEST FOR
CALIFORNIA RECONVEYANCE)	JUDICIAL NOTICE (DOCKET NO. 37)
COMPANY; and DOE individuals 1 to 100,)	
inclusive; and ROE corporations 1 to 30,)	
inclusive,)	
)	
Defendants.)	
)	

Defendants JPMorgan Chase Bank, N.A., individually and as an acquirer of certain assets
 and liabilities of Washington Mutual Bank, F.A. from the Federal Deposit Insurance
 Corporation, acting as receiver ("Chase"), and California Reconveyance Company ("CRC")
 (collectively, "Defendants"), by and through their undersigned counsel, hereby lodge their

1 objection ("Objection") to Plaintiff Hanh Nguyen's ("Plaintiff") Request for Judicial Notice –
 2 FRE 201 (Docket No. 27) (the "RJN"). Defendants' Objection is supported by the following
 3 memorandum of points and authorities, the record herein, and any argument the Court may hear
 4 on this matter.
 5

6 MEMORANDUM OF POINTS AND AUTHORITIES

7 Defendants object to Plaintiff's RJN because the request lacks any context or relevance to
 8 the instant proceeding, and, at the very least, appears to be premature. Plaintiff requests that the
 9 Court take judicial notice of a recent Michigan Supreme Court decision, *Kim v. JPMorgan Chase*
 10 *Bank, N.A.* The *Kim* decision relates to the interpretation and application of a Michigan statute,
 11 MCL 600.3204, with respect to Chase's acquisition of certain assets of Washington Mutual
 12 Bank, FA, a failed bank, from the Federal Deposit Insurance Corporation, acting as receiver.
 13 Because we are not in Michigan, MCL 600.3204 has no application here, and the *Kim* decision is
 14 wholly irrelevant to this action.
 15

16 Moreover, even if, assuming for the sake of argument only, the *Kim* decision did have
 17 any relevance here, the RJN is premature because it does not coincide with any pending
 18 substantive motion. Procedurally, it is unknown at this stage of the litigation what Plaintiff's
 19 claims are, given that she has filed multiple requests to amend her complaint, the latest of which
 20 has not yet been ruled upon by the Court. (*See* Docket Nos. 10, 16, 18, 20, and 32.) It is,
 21 therefore, unclear what Plaintiff's purpose is in asking the Court to take judicial notice at this
 22 time.
 23

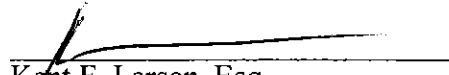
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1 For all of the foregoing reasons, Defendants respectfully request that the RJN be
2 summarily denied.
3

4 DATED this 4 day of February, 2013.

5 SMITH LARSEN & WIXOM

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7 
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SMITH LARSEN & WIXOM

A T T O R N E Y S
HILL CENTER BUSINESS PARK
1935 VILLAGE CENTER CIRCLE
LAS VEGAS, NEVADA 89134
TEL (702) 252-5002 • FAX (702) 252-5006

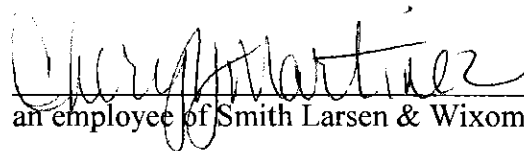
SMITH LARSEN & WIXOM

ATTORNEYS
HILLS CENTER BUSINESS PARK
1935 VILLAGE CENTER CIRCLE
LAS VEGAS, NEVADA 89134
TEL. (702) 252-5002 • FAX (702) 252-5006

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4 day of February, 2013, a true copy of the foregoing **Defendants' Objection to Plaintiff's Request for Judicial Notice (Docket No. 37)** was filed electronically via the court's CM/ECF system and served by mail, postage prepaid, to the following:

Hanh Nguyen
2131 E. Camero Ave.
Las Vegas, NV 89123
Plaintiff in Pro Per


an employee of Smith Larsen & Wixom